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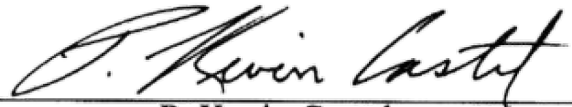
September 27, 2023

Sentencings for both Kenneth Wynder, Jr. (scheduled on October 18, 2023) and Andrew Brown (scheduled on November 15, 2023) are adjourned to January 17, 2023 at 11:00 a.m. in Courtroom 11D.  
**SO ORDERED.**

Dated: 9/28/2023

**By ECF**

Honorable P. Kevin Castel  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007



P. Kevin Castel  
United States District Judge

Re: United States v. Kenneth Wynder, Jr. and Andrew Brown  
20 Cr. 470 (PKC)

Dear Judge Castel:

I am the attorney for Kenneth Wynder, Jr., the defendant in the above-named matter, having been assigned on August 3, 2023 pursuant to the Criminal Justice Act. Mr. Wynder is scheduled to be sentenced on October 18, 2023 following his conviction at trial. Notably, counsel was appointed to represent Mr. Wynder at sentencing and was not counsel of record during the trial.

This letter is respectfully submitted to request an adjournment of Mr. Wynder's October 18 sentencing to a date in mid-January, preferably January 18 or January 17, 2024. The reason for this request is that I am scheduled to begin a state murder trial on October 16, 2023 which is expected to last for at least one month. I am also scheduled to begin a multi-defendant Hobbs Act robberies trial on January 22, 2024 before Judge Engelmayer that requires serious preparation between now and then. Additionally, having been assigned on August 3, 2023, more time is needed to familiarize myself with Mr. Wynder's case, including review of the trial transcript, trial exhibits and the 3500 material, in order to prepare for sentencing. I have been unable to conduct sufficient review of these materials since my assignment on August 3 due to the recent Jewish holidays, my son's out-of-state wedding in early September, and my preparation for the state murder trial beginning in October.

I have consulted with Mr. Wynder, who consents to the requested adjournment.

The government, by AUSA Eli Mark, objects to this request, noting that the government would not oppose an adjournment of up to sixty days, but would oppose anything longer than sixty days.

If the Court has any questions regarding this application, please do not hesitate to contact me. The Court's time and attention to this matter is greatly appreciated.

Respectfully submitted,

/ s /

Jeremy Schneider

cc: Eli J. Mark (by ECF)  
*Assistant United States Attorney*

Ying Stafford (by ECF)  
*Associate Counsel for Mr. Wynder*